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Attorneys for Defendant SCIENCE FEEDBACK

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

JOHN STOSSEL, an individual,

Plaintiff,

v.

META PLATFORMS, INC., a Delaware
corporation; SCIENCE FEEDBACK, a French
non-profit organization; and CLIMATE
FEEDBACK, a French non-profit organization,

Defendants.

Case Number: 5:21-cv-07385-VKD

**DECLARATION IN SUPPORT OF
STIPULATION TO CONTINUE
INITIAL CASE MANAGEMENT
CONFERENCE (LR 6-2(A))**

1 I, Krista L. Baughman, declare and state as follows:

2 1. I am a partner at Dhillon Law Group Inc. and counsel for Plaintiff John Stossel
3 (“Plaintiff”). I am an attorney in good standing duly admitted to practice before all Courts of the
4 State of California. I am admitted to practice law in the states of New York and California, and
5 admitted before all state and federal courts in the state of California, and the United States Court
6 of Appeals for the Eleventh Circuit. Except as to those matters stated on information and belief, I
7 have personal knowledge of the matters set forth herein and if called as a witness could and
8 would competently testify thereto. As to those matters stated on information and belief, I believe
9 them to be true.

10 2. Plaintiff filed the Complaint in the instant matter on September 22, 2021 (ECF No.
11 1.)

12 3. Defendant Meta Platforms, Inc. (“Meta”) moved to dismiss Plaintiff’s Complaint
13 pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) and to strike Plaintiff’s asserted claims
14 against Meta pursuant to California’s anti-SLAPP statute on November 29, 2021 (“Meta Motion”)
15 (ECF No. 27.)

16 4. Defendant Science Feedback (“Science Feedback”) moved to dismiss Plaintiff’s
17 Complaint pursuant to Federal Rules of Civil Procedure Rule 12(b)(6) and to strike Plaintiff’s
18 asserted claims against Science Feedback pursuant to California’s anti-SLAPP statute on January
19 31, 2022 (“Science Feedback Motion”) (ECF No. 50.)

20 5. This Court held hearings on both Meta’s Motion and Science Feedback’s Motion
21 on April 12, 2022 (ECF No. 58.)

22 6. The Court has ordered that discovery in this case is stayed as to all the Parties until
23 the Court issues an order deciding both Meta’s Motion and Science Feedback’s Motion (ECF No.
24 48.)

25 7. The Court originally set the initial Case Management Conference in this matter on
26 June 14, 2022 (ECF No. 53).

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